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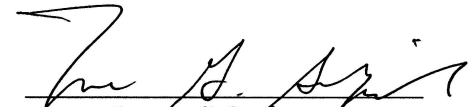
March 2, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The application for an adjournment is **DENIED**. By **March 9, 2022**, the parties shall file a joint letter and proposed case management plan and scheduling order. The Court does not typically adjourn the initial conference until after a response to the Complaint. The Clerk of Court is respectfully directed to close the motion at Docket No. 33.

Dated: March 3, 2022
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Keila Severino, et al. v. Avondale Care Group, LLC,
(Index No. 21-CV-10720)

Dear Judge Schofield:

This firm represents defendant Avondale Care Group, LLC (“Avondale”) in the above-referenced action. Pursuant to Your Honor’s Individual Rule I(B)(2), we write on behalf of both plaintiff Keila Severino (“Plaintiff”) and Avondale to request an adjournment of the initial conference currently scheduled for March 16, 2022.

Plaintiff commenced this collective action against Avondale on December 15, 2021 but had not yet served her complaint on Avondale when Your Honor issued the January 31, 2022 scheduling Order. On February 25, 2022, Plaintiff requested that Avondale agree to waive service of process. Avondale consented to Plaintiff’s request and executed a Waiver of the Service of Summons (“Waiver”). A copy of Avondale’s Waiver is being filed contemporaneously with this letter motion. Pursuant to the Waiver, Avondale now has until April 26, 2022 to file its answer or otherwise move against Plaintiff’s complaint.

The parties jointly request an adjournment of the March 9, 2022 deadline for the initial conference submissions and the March 16, 2022 initial conference to a date after April 26, 2022. No previous requests have been made for an adjournment or an extension of time and Plaintiff joins Avondale’s request.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Heather Robinson